

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

**TO: Eric Abraham, Esq.
Hill Wallack LLP
21 Roszel Road
Princeton, New Jersey 08540**

*Attorneys for Defendants Hetero Labs Limited and Hetero Drugs, Limited (hereinafter
“Defendants”).*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Venkataramana Madireddy, Associate Vice President, Corporate Quality Assurance, on April 20, 21, and 22, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Hill Wallack LLP, 21 Roszel Road, Princeton, New Jersey 08540, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

Topic 1, 3, 19, 28, 30, 35, 36, 38, 45, 47, 49, 52

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated: March 19, 2021

By: /s/ Andrés Rivero
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EXHIBIT A

30(B)(6) TOPICS

Nitrosamine Contamination

1. The cause of the contamination of HLL's valsartan API with nitrosamines, including, but not limited to, NDMA and NDEA.
3. The root cause investigation for the nitrosamine impurities, including NDMA and NDEA in the HLL API.

Testing

19. The extent of the actual and potential nitrosamine contamination of HLL's valsartan API and valsartan finished dose sold in the United States, both in terms of the concentration per pill, and across all of the lots/batches.

Process Development

28. Any evaluation conducted by or on behalf of HLL with regard to health or safety issues arising from the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for HLL's valsartan API.
30. HLL's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of HLL's valsartan API.

Communications with Regulatory Agencies

32. The communications with any regulatory authority, including but not limited to the FDA, with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for HLL's valsartan API.
33. HLL's communications with regulatory authorities, including the FDA, with regard to the actual or potential contamination of HLL's valsartan API with nitrosamines including NDMA and NDEA.
34. HLL's filings with regulatory authorities, including the FDA, regarding manufacturing process changes for HLL's Valsartan API Drug Master Filings for the valsartan API sold in the United States.

HLL's Communications with Finished Dose Customers and Downstream Customers

35. HLL's oral and written communications with its valsartan API Customers (including vertically integrated facilities) or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the HLL API.
36. HLL's oral and written statements to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of HLL's valsartan API.

38. HLL's product recall for valsartan API, including who HLL communicated with, how, about what, and the retention of recalled or sequestered HLL valsartan API, including as a component of finished dose.

Product Tracing

45. Tracing of batches and lots of HLL's valsartan API sold downstream and ultimately intended for use by consumers in the United States.
47. The pricing of HLL's valsartan API that was ultimately sold in the United States.
49. The gross and net profits to HLL from the sale of HLL's valsartan API in the United States.
52. HLL's valsartan API sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days ahead of deposition during meet and confer process).

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Venkataramana Madireddy.
2. The complete production of Venkataramana Madireddy relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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